

## REMARKS/ARGUMENTS

This amendment responds to the Office Action dated September 10, 2007.

The Examiner has allowed claims 1-4 and 12-19.

The Examiner rejected claims 5-11 and 20-22 under 35 U.S.C. § 103(a) as being obvious in view of the combination of Ostromoukov, U.S. Patent No. 6,356,362 and Smith, U.S. Patent No. 5,633,729. The applicant respectfully argues that each of these rejections is improper, as the proposed modification, as specifically suggested by the Examiner, neither teaches nor suggests a limitation required by the rejected claims.

First, independent claim 5, from which claims 6-11 respectively depend, includes the limitations of “providing respective accumulated pixel errors, each based on at least one respective variance between a rendered intensity of a pixel and a quantized measured intensity of a corresponding pixel of a contone image to be displayed” and “selecting a first predetermined intensity threshold if either one of said current said accumulated pixel error and a neighboring said accumulated pixel error is less than an error threshold.” The Examiner concedes that, although Ostromoukov discloses the accumulated errors as claimed, the reference does not disclose using those accumulated errors to select a first intensity threshold.

Smith discloses, not the claimed accumulated errors, but *quantization errors*, i.e. the difference between the quantized intensity of a source pixel from the actual intensity of the source pixel, prior to the step of quantization. As noted in applicant’s prior response, Smith’s quantization error is not “based on at least one respective *variance between a rendered intensity of a pixel and a quantized measured intensity of a corresponding pixel of a contone image to be displayed*.” Rather, a quantization error has no relationship to the intensity at which a source pixel (quantized or not) is rendered. Hence, *even if* one were to assume that the Examiner were correct that it would be obvious to select an appropriate threshold based on Smith’s *quantization error*, rather than Ostromoukov’s gradient, that quantization error does not satisfy the claimed definition of an “accumulated error.” Therefore, the Examiner’s proposed combination fails to teach or suggest the all claim limitations recited in claims 5-11, and on that basis, the rejection of these claims is improper.

Similarly, claim 20, from which claims 21 and 22 respectively depend, recites the limitation of “a threshold selection unit selecting one of a plurality of predetermined threshold intensities for said selected threshold unit in response to at least one of said accumulated errors of said current pixel and a pixel neighboring said current pixel.” The Examiner’s proposed combination would select a threshold intensity based on a mere quantization error, which as explained above is *not an accumulated error* as defined in claim 20. The applicant notes that, although the claimed accumulated error is measured as the *difference* between a rendered pixel value and a *quantized* source image pixel value, Smith’s quantization “error” is not a difference between a rendered pixel intensity value and *anything*, hence the Examiner’s proposed substitution of Smith’s quantization error as a basis for selecting one of Ostromoukov’s thresholds does not teach or suggest the claim limitations at issue.

In view of the foregoing amendments and remarks, the applicant respectfully requests reconsideration and allowance of claims 1-22.

Respectfully submitted

  
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